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9 **UNITED STATES DISTRICT COURT**  
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

11  
12 ARTHUR KAYE IRA FCC AS  
13 CUSTODIAN DTD 6-8-00 and  
14 HAYDEN LEASON, Individually and  
On Behalf of All Others Similarly  
Situated,

15 Plaintiffs,

16 v.

17 IMMUNOCELLULAR  
18 THERAPEUTICS, LTD., DAVID  
19 FRACTOR, MANISH SINGH, LAVOS,  
20 LLC, LIDINGO HOLDINGS, LLC,  
21 KAMILA BJORLIN, ANDREW  
HODGE, and BRIAN NICHOLS,

22 Defendants.  
23

Case No. 2:17-cv-03250-FMO (SK)

CLASS ACTION

**NOTICE OF MOTION AND  
MOTION FOR FINAL  
APPROVAL OF DISTRIBUTION  
PLAN**

**Date: April 9, 2020**

**Time: 10:00 a.m.**

**Room: 6D**

**Judge: Hon. Fernando M. Olguin**

**TO THE CLERK OF THE COURT AND ALL PARTIES AND  
THEIR ATTORNEYS OF RECORD HEREIN:**

**PLEASE TAKE NOTICE** that on April 9, 2020 at 10:00 a.m. before the Honorable Fernando M. Olguin, in Courtroom 6D of the United States District Court, Central District of California, 350 W. 1st Street, Los Angeles, California 90012, Lead Plaintiffs and Settlement Class Representatives Arthur Kaye IRA FCC as Custodian DTD 6-8-00 and Hayden Leason (“Lead Plaintiffs”)<sup>1</sup> will move the Court to enter the accompanying [Proposed] Class Distribution Order, which among other things, will: (i) approve the administrative determinations of the Claims Administrator in accepting and rejecting the Claims submitted by Claimants; (ii) authorize payment of \$56,522.05 from the Settlement Fund to the Claims Administrator for the balance of the fees and expenses incurred and to be incurred in connection with the claims administration process; (iii) approve distribution of the Net Settlement Fund to Authorized Claimants; and (iv) authorize the destruction of paper copies of Proof of Claim Forms and electronic copies of Claim records following distribution of the Net Settlement Fund.

This Motion is based on this Notice of Motion, the concurrently filed Memorandum of Law in Support of Lead Plaintiffs’ Motion for Approval of Distribution Plan, the concurrently filed Declaration of Dan Deschamps in Support of Lead Plaintiffs’ Motion for Approval of Distribution Plan, the concurrently filed Declaration of Don M. Blandin in Support of Lead Plaintiffs’ Motion for Approval of Distribution Plan, as well as all pleadings and papers filed in this Action, arguments of counsel, and any other matters properly before the Court.

This motion is made following the conference of counsel pursuant to Local Rule 7-3, which took place on February 26 and 27, 2020. Co-Lead Counsel conferred with Defendants’ counsel with respect to this motion prior to filing, and

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<sup>1</sup> Unless otherwise noted, all capitalized terms herein have the same meaning set forth in the Parties’ Amended Stipulation of Settlement dated December 10, 2018 (the “Stipulation”). ECF No. 132.

1 Defendants' Counsel have authorized Co-Lead Counsel to represent that  
2 Defendants do not take a position on the motion.

3  
4 Dated: March 9, 2020

Respectfully submitted,

5 By: /s/ Rosanne L. Mah

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*Liaison Counsel for Plaintiffs*

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 9, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record and other CM/ECF participants.

/s/ Rosanne L. Mah  
Rosanne L. Mah